



SO ORDERED.

November 14, 2022

November 10, 2022

VIA ECF

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, New York 10007

Writer's Direct Dial: (484) 270-1465
E-Mail: snirmul@ktmc.com
Please reply to the Radnor Office

Re: Sjunde AP-Fonden, et al. v. Gen. Elec. Co., et al., Case No. 17-cv-8457 (JMF)

Dear Judge Furman:

Pursuant to Rule 7(C) of Your Honor's Individual Rules and Practices in Civil Cases, Standing Order 19-MC-583, and Section 6 of the Southern District of New York Electronic Case Filing Rules & Instructions, Class Representatives Sjunde AP-Fonden and The Cleveland Bakers & Teamsters Pension Fund ("Plaintiffs") respectfully seek leave to file under seal a document identified as PX 139 to the Omnibus Declaration of Sharan Nirmul filed in support of Plaintiffs' summary judgment opposition brief, *Daubert* opposition briefs, and affirmative *Daubert* motions (the "Nirmul Declaration") (ECF Nos. 384, 385).

It has come to Plaintiffs' attention that, in the course of attaching under seal exhibits to the Nirmul Declaration, PX 139 was inadvertently omitted. *See* ECF No. 385. PX 139 is a document that was designated by Defendants as "Confidential" pursuant to the Stipulated Protective Order (ECF No. 227). To ensure that the Court and Defendants have a complete set of the exhibits identified in the Nirmul Declaration and cited in Plaintiffs' summary judgment papers, Plaintiffs respectfully request the Court grant their request for leave to file PX 139 under seal.

Respectfully submitted,

Sharan Nirmul

cc: All counsel of record (VIA ECF)